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Via ECF

INTERNATIONAL LEGAL MATTERS

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LICENSED & ADMITTED
SUPREME COURT OF THE UNITED STATES OF AMERICA
U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT
U.S. COURT OF INTERNATIONAL TRADE
OTHER U.S. FEDERAL COURTS
STATES OF NEW YORK & MICHIGAN ONLY
LONDON COURT OF INTERNATIONAL ARBITRATION

11 September 2023

Hon. Ona T. Wang, M.J.
United States District Court
500 Pearl Street
New York, NY 10007

Re: *El Omari v. Dechert LLP, et al*, Case No. 23-cv-04607 (S.D.N.Y.)

Dear Judge Wang:

This firm represents Oussama El Omari, Plaintiff in the above action. This letter is written in response to Defendant Dechert LLP's letter motion to stay discovery dated 9/8/23 (ECF 45), and the Vital Defendants' letter "concurring" dated 9/9/23 (ECF 46). Plaintiff does not oppose Defendant Dechert's request, although not for the reasons stated in their letter. Plaintiff understands from the Vital Defendants' letter that they join in Defendant Dechert's request. Plaintiff also does not oppose a stay on discovery as to the Vital Defendants, to the extent that such a discovery stay does not interfere with Plaintiff's pending motions for a TRO and Preliminary Injunction. (See ECF 6, 42)

On another note, the parties held a meet and confer today on the Laptop "extraction" issue prior to the conference scheduled for 9/12/23 at 2:30 pm, as directed by the Court. (See ECF 33). Plaintiff and the Vital Defendants could not come to a resolution.

Respectfully submitted,

MOORE INTERNATIONAL LAW PLLC

BY: /s/ Scott M. Moore

Scott Michael Moore
Attorney at Law
Counsel for Plaintiff, Oussama El Omari

cc: All counsel of record